

Statement of Basis For Title V Permit

Company Name	First Energy - West Lorain Plant	
Premise Number	0247080487	
Number of Non-insignificant Emissions Units	7	
What makes this facility a Title V facility?	Potential emissions of nitrogen oxides, carbon monoxide, sulfur dioxide and particulate matter.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
1	Chapter 20	Y	Other - 40 CFR Part 61 Requirement to conduct all asbestos renovation and demolition activities at this facility in accordance with the applicable requirements.
2	25-03	N	Requirement to develop and submit emission control action programs upon notification.

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Ot he r							
B001 through, B006	20% opacity as a 6-minute average	17-07(A)		Y	Y	Y	Y	Y	N	OR - These are inherently clean emissions units based upon our knowledge and experience in regulating these types of emissions units. The emissions units shall only be fired with number two fuel oil. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B001 and B002	0.040 lbof particulate/mmBtu	17-11(B)(4)		Y	Y	Y	Y	Y	N	OR - These are inherently clean emissions units based upon our knowledge and experience in regulating these types of emissions units. The emissions units shall only be fired with number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B003 through, B006	0.020 lbof particulate/mmBtu	17-10(B)(1)		Y	Y	Y	Y	Y	N	OR - These are inherently clean emissions units based upon our knowledge and experience in regulating these types of emissions units. The emissions units shall only be fired with number two fuel oil. ET- If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B001 and B002	0.5 lb of sulfur dioxide/mm Btu	18-06(E)		Y	Y	Y	Y	N	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. The emissions units shall only be fired with number two fuel oil. ET - No emission testing is required-when burning number two fuel oil compliance will be based upon fuel analyses.
B003	2.32 lbs of sulfur dioxide/mm Btu	18-53(A)(1)		Y	Y	Y	Y	N	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. The emissions units shall only be fired with number two fuel oil. ET - No emission testing is required-when burning number two fuel oil compliance will be based upon fuel analyses.
B004 and B005	1.7 lbs of sulfur dioxide/mm Btu	18-53(A)(2)		Y	Y	Y	Y	N	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. The emissions units shall only be fired with number two fuel oil. ET - No emission testing is required-when burning number two fuel oil compliance will be based upon fuel analyses.
B006	5.87 lbs of sulfur dioxide/mm Btu	18-53(A)(1)		Y	Y	Y	Y	N	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. The emissions units shall only be fired with number two fuel oil. ET - No emission testing is required-when burning number two fuel oil compliance will be based upon fuel analyses.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no comments. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.